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## Mars Khaimov Law, PLLC

### VIA ECF

Honorable Magistrate Stewart D. Aaron  
United States District Magistrate Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

June 15, 2023

Re: *Toro v. Georgia Gifts and More, LLC, Case 1:22-cv-8489*  
Status of Case

Dear Judge Aaron:

The Parties submit this status letter jointly, in accordance with Your Honor's Order dated April 25, 2023(Dkt. No. 19). The status of the discovery in this case is as follows:

On April 20, 2023, Plaintiff sent to Defendant its Requests for Admission, Requests for Production and Interrogatories. Defendant responded to Requests for Admissions on May 18 but has not yet to respond to the other demands. Defendant has not sent any requests or demands to Plaintiff. Plaintiff anticipates that this case will rely heavily on expert discovery. However, in light of the outstanding fact discovery herein, Plaintiff respectfully requests a 30-day extension of the fact discovery deadline from the date of this letter, up to and until July 15, 2023.

To facilitate a resolution of the matter, the Parties also request a referral to the District's Mediation Program immediately.

We thank the Court for its consideration and attention herein.

Respectfully submitted,

/s/ Mars Khaimov

Mars Khaimov, Esq.  
Attorney for Plaintiff

/s/ David Stein

David Stein, Esq.  
Attorney for Defendant

